

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF**  
**SOUTH CAROLINA**

**DOCKET 2012-136-C**

IN RE:

Office of Regulatory Staff Petition to	)	<b>FRONITER COMMUNICATIONS OF</b>
Review FCC Mandated Reductions to	)	<b>THE CAROLINAS, INC.'S</b>
Intrastate Access Tariffs	)	<b>PETITION TO INTERVENE</b>
_____	)	

Petitioner Frontier Communications of the Carolinas, Inc. ("Frontier") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to Rule 103-825 of the Commission's Rules, for an order allowing Frontier to intervene in the above-referenced Docket with full rights to participate as a party of record. In support of its Petition, Frontier submits the following to the Commission:

1. Frontier is a facilities-based incumbent local exchange carrier in South Carolina.
2. Frontier seeks to intervene in this proceeding with full rights to participate as a party of record to represent its interests.
3. On March 29, 2012, the Office of Regulatory Staff ("ORS") filed a petition requesting that the Commission order all local exchange carriers affected by the FCC's USF/ICC Reform Order<sup>1</sup> to file appropriate tariff revisions on or before June 1, 2012 to provide the ORS,

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<sup>1</sup> See *Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-61 (rel. Nov. 18, 2011) and Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011). The ILEC Group also notes that the FCC's December 7, 2011 Order in this docket was amended by an Errata Order issued December 9, 2011 ("ICC/USF Reform Order").

the Commission, and others the opportunity to review the proposed tariff filings prior to the July 1, 2012 deadline established by the FCC.

4. On April 27, 2012, the South Carolina Cable Television Association (“SCCTA”) filed a Petition to Intervene in this docket. SCCTA’s filing also included a request for the Commission to examine the impact of the FCC’s ICC/USF Reform Order on the South Carolina Interim LEC Fund (“ILF”).

5. On May 2, 2012, the Competitive Carriers of the South (“CompSouth”) filed a Petition to Intervene in this docket. CompSouth concurrently filed in this docket a Petition to Implement the FCC’s Inter-carrier Compensation and Universal Service Reform order, requesting the Commission to consider re-examining and modifying the South Carolina ILF in light of the FCC’s action.

6. On May 3, 2012, the South Carolina Telephone Coalition (“SCTC”) filed a Petition to Intervene in this Docket.

7. On May 7, 2012, United Telephone Company of the Carolinas d/b/a CenturyLink (“CenturyLink”) filed a Petition to Intervene in this Docket.

8. Frontier assesses intrastate switched access charges on other carriers who use Frontier’s network and will need to modify its tariffs to comply with the ICC/USF Reform Order. Thus, Frontier has a direct and substantial interest in the subject matter of the Petition filed by ORS commencing this proceeding.

9. Frontier also receives funds from the South Carolina ILF. To the extent the Commission decides it would be appropriate to consider the issues raised by SCCTA and CompSouth regarding ILF in the context of this docket, Frontier also has a direct and substantial

interest in the appropriate implementation of the FCC Order that is the subject of the Office of Regulatory Staff's Petition in this matter.

10. While Frontier has not fully developed a final position at this time, Frontier believes also that its participation in this proceeding is essential to protect its interests and will aid the Commission in a full and fair consideration and resolution of the issues raised in this proceeding.

11. Granting this Petition will not cause any undue delay, and it will not prejudice any party to this proceeding.

12. Correspondence and communications to Frontier with respect to this proceeding should be directed to undersigned counsel:

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WHEREFORE, based upon the foregoing, Frontier respectfully requests that the Commission grant this Petition to Intervene as a formal party of record, permit its intervention to protect its interests, direct any and all parties of record provide it with a copy of any pleadings, testimony and exhibits or any other filings made in this proceeding, and grant all such other relief that deems just and proper.

Respectfully submitted this the 10<sup>th</sup> day of May, 2012.

FRONTIER COMMUNICATIONS OF THE CAROLINAS,  
INCORPORATED

BY: 

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May 10<sup>th</sup>, 2012.

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\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

This is to certify that I, Kathy J. Templeton, an employee of the firm of Richardson Plowden & Robinson, PA, have on May 10, 2012, served one (1) copy of the foregoing Petition to Intervene filed on behalf of Frontier Communications of the Carolinas, Inc. in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service (unless otherwise specified), first class postage prepaid and affixed thereto, and addressed as follows:

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**VIA ELECTRONIC MAIL SERVICE**

The Honorable Jocelyn G. Boyd, Esquire  
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May 10, 2012  
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Kathy J. Templeton